

# EXHIBIT 1

**Jocelyn Ma**

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----- Forwarded message -----

From: "Ciliberti, Katharine R." <[KCiliberti@jenner.com](mailto:KCiliberti@jenner.com)>

Date: Sep 8, 2020 10:57 AM

Subject: Waymo v. Uber -- stipulation to amend protective order

To: David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>

Cc:

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[EXTERNAL EMAIL]

Dear David,

I represent Uber Technologies, Inc. with respect to the matter of *Levandowski v. Uber*, Adv. Proc. No. 20-3050 HLB, which is an adversary proceeding pending in the U.S. Bankruptcy Court for the Northern District of California (Case No. 20-30242 HLB). As you are likely aware, Google LLC recently intervened in that matter with respect to one of Levandowski's counts.

I am reaching out because it is my understanding that you are counsel of record for Waymo LLC in the Waymo v. Uber litigation. As you may be aware, Uber, Levandowski, and Google each acknowledge and agree that the pleadings, filings, discovery materials, and trial materials from the Waymo v. Uber litigation are relevant and necessary to resolving the Levandowski v. Uber proceeding, and therefore are working to arrange the production and use of the materials from the Waymo v. Uber litigation in and for the purpose of the Levandowski v. Uber proceeding.

To that end, we are proposing that the parties enter into a new stipulation, and file it on the Waymo v. Uber docket, amending the protective order that governs the Waymo v. Uber litigation. We are attaching that proposed stipulation here. Assuming the stipulation is acceptable to you, we appreciate you and your client executing the stipulation. Of course, if it raises any concerns, please let us know promptly. The parties in the Levandowski v. Uber case are appearing for a case management conference on September 17 and would like to report to the bankruptcy court that this proposed amendment to the protective order has been entered. To that end, we appreciate hearing back from you at your earliest convenience this week.

We would also appreciate your confirmation, on behalf of Waymo, that there will be no destruction of the discovery from or other documents related to the Waymo v. Uber litigation other than as further agreed upon by the parties to Levandowski v. Uber proceeding.

Please advise.

Regards,

Katie

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**Katharine R Ciliberti**

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